

**BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI**

**FILED**

DEC 14 2007

ADMINISTRATIVE HEARING  
COMMISSION

**PHILLIP L. JOYCE**

**Petitioner,**

**vs.**

**Case No.: 07-1364 DI**

**DOUGLAS M. OMMEN, Director  
Department of Insurance, Financial  
Institutions and Professional Registration,  
State of Missouri,**

**Respondent.**

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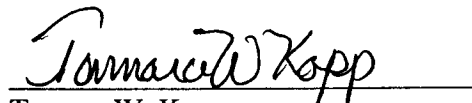
**RESPONDENT'S MOTION FOR LEAVE TO AMEND ANSWER**

Respondent, Douglas M. Ommen, director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, through counsel, and pursuant to 1 CSR 15-3.380 hereby moves for leave to amend Respondent's Answer. In support thereof, Respondent states as follows:

1. Petitioner filed a Petition on August 6, 2007, with the Administrative Hearing Commission appealing Respondent's refusal of his bail bond agent license renewal application.
2. Respondent has determined that there are additional grounds for cause to deny Petitioner's renewal application that were not pleaded in the Answer filed on September 13, 2007. See Exhibit A, attached hereto.
3. Petitioner hereby requests that the Commission deem Respondent's First Amended Answer as filed in this case.
4. This motion is made in the interest of justice and not with the intent to hinder these proceedings in any manner.

**WHEREFORE**, Respondent respectfully requests that this Commission grant Respondent's Motion for Leave to Amend.

Respectfully submitted,

A handwritten signature in cursive script, reading "Tamara W. Kopp", is written over a horizontal line.

Tamara W. Kopp

Missouri Bar # 59020

Missouri Department of Insurance, Financial  
Institutions & Professional Registration

301 West High Street, Room 530

Jefferson City, Missouri 65101

Telephone: (573) 751-2619

Facsimile: (573) 526-5492

**ATTORNEY FOR PETITIONER**

Douglas M. Ommen, Director

Missouri Department of Insurance, Financial  
Institutions & Professional Registration